

ANDREW FURMAN

Direct Dial: (212) 574-4119 afurman@chartwelllaw.com

Reply To: New York Office One Battery Park Plaza, Suite 710 New York, NY 10004

Phone: (212) 968-2300 Facsimile: (212) 968-2400

April 2, 2025

Via ECF

Hon. Robert W. Lehrburger, USMJ Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: New Land Interiors Corp. v. Kinsale Insurance Company

Civil Action No.: 25-CV-00732 [DEH][RWL]

Dear Judge Lehrburger:

Plaintiff, New Land Interiors Corp. ("New Land"), and defendant, Kinsale Insurance Company ("Kinsale"), write jointly to request an adjournment of the upcoming initial pre-trial conference in this action, which is currently scheduled for April 9, 2025 at 9:30 am. No prior request for this relief has been made.

Prior to it interposing an Answer in this action, on March 27, 2025, Kinsale filed a motion to stay this action and compel it to arbitration based on an arbitration provision contained within the applicable Kinsale policy of insurance. *See*, ECF Doc. Nos. 11-13. While New Land disputes the validity of the arguments raised in Kinsale's motion, it is clear that if this Court grants Kinsale's motion this matter will be stayed and referred to arbitration, obviating the need for the parties to engage in discovery proceedings before this Court. As a result, the parties are requesting that the initial pre-trial conference be adjourned until after Kinsale's motion is decided.

The parties also request that the Court enter a briefing schedule on Kinsale's motion as follows: opposition due by May 1, 2025; reply due by June 2, 2025.

Page 2 of 2

We thank Your Honor for Your attention to this matter.

Granted. The initial pretrial conference is adjourned sine die. Opposition to the motion to stay and compel arbitration shall be filed by May 1, 2025, and the reply shall be filed by June 2, 2025.

SO ORDERED:

04/03/2025

HON, ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE Very truly yours,

CHARTWELL LAW

By: /s/ Andrew Furman

Andrew Furman, Esq. Attorneys for Plaintiff

One Battery Park Plaza, Suite 710 New York, New York 10004

P: (212) 968-2300

afurman@chartwelllaw.com

KENNEDYS CMK LLP

By: /s/ Eridania Perez

Eridania Perez, Esq. Attorneys for Defendant 22 Vanderbilt Avenue, Suite 2400 New York, New York 10017

P: (212) 252-0004

eridania.perez@kennedyslaw.com